

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

UNITED STATES OF AMERICA,)	Case No. 8:13CR105
)	
Plaintiff,)	
)	
-vs-)	MOTION FOR ADDITIONAL
)	DISCOVERY
)	
)	
TIMOTHY DEFOGGI,)	
Defendant.)	

COMES NOW Defendant, by and through counsel, pursuant to Fed. R. Crim. P Rule 16 (a) and hereby moves this Court for an order permitting the Defendant to inspect, copy and/or photograph the following items for the above captioned matter:

1. Electronic copy of the four USB thumb drives seized from Defendant's residence on April 9, 2013, with forensic analysis and evaluation and report of the existence of malware, as follows:

- a. 4 GB thumb drive, silver;
- b. 8 GB thumb drive, black;
- c. 2 GB thumb drive, black; and

- d. 1 GB thumb drive, black;
2. Five CDs labeled Dale's Porn;
3. Dell laptop computer;
4. Identification of computers, laptops and/or tables that utilized user access restrictions;
5. Photocopy of the U.S. Government's Identification cards seized on an AO 93, FD 886 of FD597;
6. Scif access ID badge bearing photo and Sci access colors; and
7. Copy of all supplemental items as identified on form AO 93.

Respectfully submitted,
Timothy Defoggi, Defendant

/s/ John S. Berry
John S. Berry, #22627
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Michael Norris, Assistant U.S. Attorney and Keith A. Becker, U.S. Department of Justice, by electronically serving a copy of the same to both via CM/ECF, on this the 6th day of March, 2014.

/s/ John S. Berry
John S. Berry, #22627